

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

JAHREEK BUSH,

Defendant.

INDICTMENT

23 Cr. 545

COUNT ONE
(Distribution of Narcotics)

The Grand Jury charges:

1. Between on or about January 5, 2023 and April 24, 2023, in the Southern District of New York and elsewhere, JAHREEK BUSH, the defendant, knowingly and intentionally distributed and possessed with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

2. The controlled substances involved in the offense were (i) mixtures and substances containing a detectable amount of heroin, (ii) mixtures and substances containing a detectable amount of cocaine, (iii) mixtures and substances containing a detectable amount of cocaine base, and (iv) mixtures and substances containing a detectable amount of fentanyl in violation of Title 21, United States Code, Section 841(b)(1)(C).

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C);

Title 18, United States Code, Section 2.)

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COUNT TWO
(Distribution of Narcotics)

The Grand Jury further charges:

3. On or about January 20, 2023, in the Southern District of New York and elsewhere, JAHREEK BUSH, the defendant, knowingly and intentionally distributed and possessed with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

4. The controlled substance involved in the offense was a mixture and substance containing a detectable amount of fentanyl in violation of Title 21, United States Code, Section 841(b)(1)(C).

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C);

Title 18, United States Code, Section 2.)

COUNT THREE
(Distribution of Narcotics)

The Grand Jury further charges:

5. On or about April 25, 2023, in the Southern District of New York and elsewhere, JAHREEK BUSH, the defendant, knowingly and intentionally distributed and possessed with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

6. The controlled substances involved in the offense were (i) mixtures and substances containing a detectable amount of cocaine and (ii) mixtures and substances containing a detectable amount of fentanyl in violation of Title 21, United States Code, Section 841(b)(1)(C).

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C);

Title 18, United States Code, Section 2.)

COUNT FOUR
(Firearms Use, Carrying, and Possession)

The Grand Jury further charges:

7. On or about April 25, 2023, in the Southern District of New York and elsewhere, JAHREEK BUSH, the defendant, during and in relation to a drug trafficking crime for which he may be prosecuted in a court of the United States, namely, the drug trafficking crime charged in Count Three of this Indictment, knowingly did use and carry a firearm, and in furtherance of such a crime, did possess a firearm, to wit, a loaded, 9 mm semiautomatic Star Model Super B handgun bearing serial number 124829.

(Title 18, United States Code, Sections 924(c)(1)(A)(i) and 2.)

FORFEITURE ALLEGATION

8. As a result of committing the offenses alleged in Counts One, Two, Three, and Four of this Indictment, possession with intent to distribute cocaine in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C), the defendant, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any and all property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of said offense and any and all property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

SUBSTITUTE ASSET PROVISION

9. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:


- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;

- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the above forfeitable property.

(Title 21, United States Code, Section 853.)


FOREPERSON


DAMIAN WILLIAMS
United States Attorney